

UNITED STATES DISTRICT COURT

for the

Northern District of Alabama

United States of America
v.
MOHAMMAD A.H. MOHAMMAD

Case No.

MAG. NO. 24-597

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 21, 2024 in the county of Jefferson in the
Northern District of Alabama, the defendant(s) violated:*Code Section*

18 U.S.C. Sec. 1958

Offense Description

Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Complainant's signature

FBI SA Gregory Harry

Printed name and title

Sworn to telephonically by me..

Date: 09/23/2024City and state: Birmingham, Alabama

Judge's signature

STACI G. CORNELIUS U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Gregory Harry, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a criminal complaint against **Mohammad A. H. Mohammad** for violations of 18 U.S.C. § 1958 [Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire].
2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since 2021. I am currently assigned to the Birmingham Division. Prior to joining the FBI, I served as a Detective with the Tyler, Texas Police Department for more than 10 years. As a Detective, I held a Master Peace Officer License in the State of Texas and served as an FBI Task Force Officer out of the Tyler Resident Agency within FBI's Dallas Division. I earned a bachelor's degree in economics from Texas A&M University. In the course and scope of my employment, I have conducted and led numerous investigations of criminal enterprises and individual criminal activity for acts in violation of state and federal statutes.
3. The statements in this affidavit are based on my personal observations, my training and experience, my investigation of this matter, and information obtained from other agents and witnesses. Because this affidavit is intended to show only that there is sufficient probable cause to support a criminal complaint and arrest warrant against **Mohammad**, I have not included each and every fact known to me concerning this investigation.

FACTS SUPPORTING PROBABLE CAUSE

4. **Mohammad A. H. Mohammad**, male, date of birth August 28, 1961, resides in Hoover, Alabama (AL), within the Northern District of Alabama. **Mohammad** is married to Wife S.A. (age 55) (Wife), and has six children, including: Son I.M. (age 34), Son A.M. (age 32), Daughter S.Z. (age 30), Daughter H.M. (age 29), Son O.M. (age 22), and Daughter Y.M. (age 21). **Mohammad** is a plumber, who owns American Plumbing Service, LLC., located at 94 Robert Jemison Rd., Homewood, AL. The FBI understands that **Mohammad** and Wife S.A. are involved in active divorce proceedings.

5. **Mohammad** is known to utilize phone number 205-515-5252 (Device 5252). **Mohammad's** Device 5252-number is linked to **Mohammad** in multiple police reports and was confirmed as being **Mohammad's** by witnesses, family members, and Cooperating Witness 1 (CW1). According to a records search, Device 5252 is a number operating on the AT&T cellular network. AT&T is a corporation based in the U.S. State of Florida.

6. **Mohammad** is known to operate a black 2010 Toyota Sequoia bearing Alabama License Plate 1A0YAUX. According to a law enforcement records database check, Alabama License Plate 1A0YAUX is registered to Budget Rooter Plumbing, in Birmingham, AL 35209.

7. In November of 2021, **Mohammad** was arrested by the Hoover Police Department (HPD) and charged with domestic violence for assaulting Daughter S.Z. Those charges were subsequently dismissed.

8. Three Protection from Abuse Orders (PFA) were issued in Jefferson County, Alabama on November 23, 2021 against **Mohammad**. According to the orders, **Mohammad** is “restrained from assaulting, threatening, abusing, harassing, following, interfering, or stalking” the protected persons and/or “the child of the protected person.” The protected persons named in the orders include Daughter H.M. (Jefferson County Circuit Court (JCCC) case number DR-21-500889), Son O.M. (JCCC case number DR-21-500888), and Wife (JCCC case number DR-21-500889)

9. According to Wife’s PFA paperwork, acquired by the FBI, Wife and **Mohammad** were married on March 18, 2021. According to Wife’s “Petition for Protection from Abuse” which Wife executed, Wife explained she genuinely fears further abuse because “[**Mohammad**] has told [Wife] he will come after [her].” Wife continues, “[**Mohammad**] has hurt me and my kids & used weapons against us [... **Mohammad**] said he wanted to shoot my daughter between the eyes.” In another document within Wife’s PFA paperwork, she described how Mohammad “threaten to lock us in the basement and kill us. He always threatens me and my children with violence. He has put his hands on my kids and sent them to the emergency room. He has put a gun & knife against my kids heads and throats. He has shot guns at us.”

10. On April 22, 2022, **Mohammad** was arrested by HPD and charged with Stalking 1st Degree – a felony under the laws of the State of Alabama, for placing GPS tracking devices on the cars of his family members, including Wife, in violation of the existing PFA orders.

11. On January 3, 2023, Hoover Police and Fire units responded to a residence in Hoover for reports of a vehicle arson. The burned vehicle was associated with a close friend of **Mohammad's** wife. Surveillance video captured a suspect vehicle used in the arson. According to the HPD, the suspect vehicle had been purchased by **Mohammad**.
12. On January 4, 2023, Son I.M.'s silver Ram pickup truck was set on fire in the driveway of Wife's residence in Hoover, AL.
13. On August 28, 2023, a GPS tracking device was discovered on Daughter Y.M.'s car and reported to the Homewood Police Department.
14. On September 20, 2023, Son O.M.'s Toyota 4Runner SUV and three other vehicles were found burned in a suspicious fire.
15. On September 21, 2023, Wife reported to the HPD that she had located two GPS tracking devices on her vehicles.
16. On September 25, 2023, the Hoover Police Department documented that O.M. had located a GPS tracking device on his vehicle.
17. According to an HPD report, on December 9, 2023, Wife received a call from a man on behalf of **Mohammad** in an attempt to reconcile the marriage between Wife and **Mohammad**. Wife refused to reconcile according to the report.
18. On December 10, 2023, less than 12 hours after the call to Wife on behalf of **Mohammad**, Daughter Y.M.'s Toyota Avalon was burned in a suspicious fire at her residence

in Hoover, within the Northern District of Alabama. Daughter Y.M. resides in Hoover with Wife and Son O.M.

19. On December 13, 2023, **Mohammad** was arrested by HPD and charged with Violation of a Protective Order for having an associate contact Wife on December 9, 2023 in violation of the existing PFA orders. Pursuant to this arrest, a hearing was held in the 10th Judicial Circuit Court of Alabama to revoke **Mohammad's** bond on the Stalking – 1st Degree incident (April 22, 2022 arrest). During the hearing, an audio recording, captured by a witness known to the FBI, was introduced. An excerpt from the recording played for the court was heard as:

Witness: "If you hurt them (Mohammad's family), you'll go to hell forever."

Mohammad: "No, God will reward me."

The Court revoked **Mohammad's** bond and he was remanded back into state custody.

20. On February 26, 2024, **Mohammad** was released again on bond, a condition of release included the use of an ankle monitor capable of tracking **Mohammad's** location. The previous PFA orders remained in effect.

21. On August 21, 2024, Cooperating Witness #1 (CW1) was interviewed by FBI. According to CW1, on or about August 11, 2024, and continuing through that day, **Mohammad** made repeated requests for CW1 to find a person to "take care of" his family members, including Wife. **Mohammad** described the break down with his wife and children including his arrests and instances of arson involving his family members. **Mohammad** showed CW1

photographs of burned vehicles on his phone. **Mohammad** explained that he felt his pride and self-dignity had been destroyed throughout the falling-out with his family over the last few years. **Mohammad** told CW1 he was willing to “die for self-dignity” and “die for pride,” and requested CW1 to find **Mohammad** someone who was willing to “take care of” his family for him. CW1 told **Mohammad** that people from CW1’s culture, weren’t setting things on fire, but were “killing every day.” **Mohammad** responded with, “find me somebody then! Find me somebody. I’ll pay. All I need is a number” and similar comments. At another point in the same conversation, **Mohammad** told CW1, “find me somebody. You say you got people where you from, man. Just find me somebody. You don’t have to be a part of it. Just get me a name and they number. And I’ll take it from there.”

22. During a separate interaction on Saturday, August 17, 2024, in Homewood, Alabama, **Mohammad** told CW1, “get me that name and number, or I don’t want to see your face again.” For his efforts, **Mohammad** offered to compensate CW1 for providing the name and phone number of an individual willing to “take care of” **Mohammad’s** family. CW1 agreed to find someone and was immediately compensated by **Mohammad**, who paid for CW1’s hotel room for that night and several additional nights.

23. CW1 has agreed to cooperate with the FBI.

24. On August 26, 2024, CW1 reported that **Mohammad** had continued to make requests on Device 5252 demanding CW1 provide the name and phone number of someone.

25. On August 26, 2024, CW1 placed a call to **Mohammad's** Device 5252 monitored by the FBI. During the call, CW1 told **Mohammad**, "I'ma [sic] have that number for you in a couple days. We goin' do this shit." **Mohammad** responded, "I need this shit done!" CW1 replied, "I got you man, give me a couple of days man." **Mohammad** agreed and stated, "listen, I'm gunna get you some money to get me from the dealer some phones [...] Can you get it for me? I'll pay yo ass no problem."

26. An FBI Undercover Employee (FBI UCE) agreed to assist FBI Birmingham with this investigation and pose as a hitman in this case.

27. On August 28, 2024, at approximately 1:55 p.m., CW1 contacted **Mohammad** on Device 5252 to arrange a meeting and provide **Mohammad** the phone number for the FBI UCE. By text, CW1 informed **Mohammad** that they still needed "them phones." **Mohammad** responded at 4:45 p.m. with a thumbs-up emoticon. At 7:10 p.m., **Mohammad** texted, "Done." **Mohammad** told CW1 he would be willing to meet the following day at CW1's convenience.

28. According to information from Walmart Global Security, on August 28, 2024, at 6:52 p.m., an unidentified white male subject (UNSUB1) purchased two Straight Talk Wireless Samsung Galaxy cell phones and two Straight Talk Wireless \$55 "Unlimited" phone cards from Walmart, located in Homewood within the Northern District of Alabama. The total purchase price was \$257.20 and the transaction was paid for with cash. According to security video, UNSUB1 was dropped off in **Mohammad's** black Toyota Sequoia bearing Alabama License

Plate 1A0YAUX. Surveillance video shows UNSUB1 wearing a t-shirt advertising American Plumbing Service, **Mohammad's** plumbing business.

29. On August 29, 2024, CW1 and **Mohammad** agreed to meet at a location in Homewood. CW1 was equipped with an electronic recording device. Upon arrival at the meeting, **Mohammad** was carrying two Straight Talk Wireless cell phones in a Walmart shopping bag. **Mohammad** told CW1 that he had paid an individual \$400 to purchase the devices on his behalf. During the meeting, **Mohammad** provided CW1 with one of the Straight Talk Wireless cell phones and one \$55 phone card from Straight Talk Wireless for one-month of unlimited calls/text/data. **Mohammad** retained the other Straight Talk Wireless cell phone and \$55 phone card for himself.

30. **Mohammad** directed CW1 to set up the other Straight Talk Wireless cell phone, provide the phone to the FBI UCE, and then give **Mohammad** the number associated with the FBI UCE's Straight Talk cellphone. An excerpt from their conversation is as follows:

Mohammad: You tell him, you tell him **Mohammad** said he doesn't even want to know even your number. Give him, give him a peace of mind. Let him set this one up, give me the number, you give it to me, we can read, on a scratch piece of paper. Okay? As soon as we can get that, I [Unintelligible (UI)].

CW1: Aight. Aight, I'm out of it. Hey, you gotta, hey, you gotta take care of your end of the bargain now. You gotta take care of it. Hey, that man doesn't play, now.

Mohammad: Okay.

CW1: Okay.

Mohammad: That's what I like. Does not play. No tricks. No [UI].

CW1: No. No. No. That's where I was headed to - bring him that phone. Cuz ain't no turning back.

Mohammad: No.

CW1: Aight. We good.

Mohammad: We good.

CW1: We good.

Mohammad: We good.

[Additional conversation]

CW1: Okay, I'm-a deliver this phone. I'm-a bring the number back. And that's it!

Mohammad: That's it.

31. Following the meeting, CW1 transferred the Straight Talk Wireless cell phone and \$55 phone card to the FBI.

32. On September 2, 2024, CW1 began receiving unsolicited phone calls from 205-659-9024 (Device 9024), a number unknown to him.

33. On September 3, 2024, CW1 called the Device 9024 number back and **Mohammad** answered. CW1 and **Mohammad** agreed to communicate via Device 9024 in the future.

34. On September 4, 2024, the other Straight Talk Wireless cell phone provided to the FBI was activated. The phone number 205-306-2677 was assigned to this device (Device 2677). Device 2677 was provided to the FBI UCE.

35. On September 6, 2024, CW1 texted FBI UCE's pseudonym and the phone number for Device 2677 to **Mohammad's** Device 9024 along with the message, "he ready and waiting."

36. On September 21, 2024, **Mohammad** and the FBI UCE met at a location within the Northern District of Alabama. This location was coordinated between **Mohammad** using Device 9024 and the FBI UCE using Device 2677. During the meeting, **Mohammad** explained to the FBI UCE how his family had turned against him. **Mohammad** claimed that his family had set him up to be arrested and removed from his family home. **Mohammad** told the FBI UCE how his wife had engaged in multiple extra-marital affairs and conspired to steal his money and other assets from him.

37. **Mohammad** showed the FBI UCE photographs from **Mohammad's** Apple iPhone of burned cars and burned structures belonging to his family members. The same phone was used to show the FBI UCE photographs of **Mohammad's** family members. **Mohammad** provided the FBI UCE with descriptions of the vehicles driven by his wife and children, as well as the address in Hoover where Wife, Son O.M., and Daughter Y.M. reside. **Mohammad** also drove the FBI UCE past Wife's house (also Son O.M. and Daughter Y.M.'s residence), and Daughter H.M.'s residence.

38. **Mohammad** solicited the FBI UCE to murder Wife, Son I.M., Son A.M., Daughter S.Z., Daughter H.M., Son O.M., and Daughter Y.M. in exchange for \$20,000 for Wife, and \$5,000 for each of **Mohammad's** children. Excerpts from their conversation are as follows:

Mohammad: Listen to me brother. This[sic] are seven people.

FBI UCE: Seven?

Mohammad: Six kids, and the mom. You pick and choose who you gunna take out, and get paid.

FBI UCE: I need. Okay. I-[cut off by Mohammad]

Mohammad: [Cutting the UCE off] The big whore. You want to start with the big whore? I don't mind.

[Additional conversation]

Mohammad: Anyway brother, let's talk. About money, let me tell you something brother.

FBI UCE: I need at least two grand **Mohammad** to start all this shit, then, and then you pay me back the rest on the end. I'm going, fucking, I gotta knock down seven people. And that's two thou, that's nothing.

Mohammad: Start with one at least! One! Start with one.

FBI UCE: Okay! I'll start with one.

Mohammad: Start with one. Take your time. Second. Third. Fourth. Five. I don't give fuck. Just, start with one. What's going to be to charge, start with one? I'm, I'm, I'm, I don't need. As I told you...

FBI UCE: I want 5, I want five grand for each, but just give me two grand for the first one and then you owe me. You said you'd have the money at some point.

Mohammad: I can get money. I can get money. But I need to get it, but a little, little. I don't want any bank activity.

[Additional Conversation]

FBI UCE: "I want to make sure I get [Wife] at the right spot. Make it look like a robbery"

Mohammad: Your money maximum within 2-weeks. Twenty [thousand]. Not five. Twenty. Because it's the big head [sic]. The others, it's okay. They are trash. Cockroaches. You know. But this one, deserve more. I give it to you.

39. Throughout the interaction, Mohammad referred to Wife as "whore" or "the big whore."

40. **Mohammad** provided the FBI UCE with \$550 as a down-payment for the murders, with the understanding that the remaining balance would be paid upon the deaths of the intended targets.

CONCLUSION

41. Based on the foregoing, I am applying for an arrest warrant for **Mohammad A. H. Mohammad** for violating 18 U.S.C. § 1958 [Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire].


REQUEST FOR SEALING

42. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of the criminal complaint, including this affidavit. I believe that sealing this document is necessary because the items and information to be seized are relevant to an ongoing investigation. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

Respectfully submitted,

Gregory Harry, Special Agent
Federal Bureau of Investigation

Subscribed electronically and sworn to telephonically, before me, this 23rd day of
September, 2024:



STACI G. CORNELIUS
UNITED STATES MAGISTRATE JUDGE